

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE 17 TH JUDICIAL CIRCUIT
COUNTY OF WINNEBAGO

KINGDOM AUTHORITIES
INTERNATIONAL MINISTRIES,
Plaintiff,

vs.

CHURCH MUTUAL INSURANCE
COMPANY,
Defendant.

NO. 2019 L 199

SUMMONS

To: Church Mutual Insurance Company, 11405 North Community House Road, Charlotte, NC 28277

YOU ARE HEREBY SUMMONED and required to file an answer in this case, or otherwise file your appearance, in the office of the Clerk of this Court, Winnebago County Courthouse, 400 W. State St., Rockford, Illinois, within 30 days after service of this summons, not counting the day of service. IF YOU FAIL TO DO SO, A JUDGMENT OR DECREE BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.

This case is set for a Case Management conference in courtroom 426 on 9/11/2019 at 9:00 am. FAILURE TO APPEAR MAY RESULT IN THE CASE BEING DISMISSED OR AN ORDER OF DEFAULT BEING ENTERED.

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelp.asp>, or talk with your local circuit clerk's office.

To the officer:

This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. This summons may not be served later than three (3) days before the day for appearance. If service cannot be made, this summons shall be returned so endorsed. This summons may not be served later than 30 days after its issuance.

(Seal of Court)



DATE: 6/12/2019

Thomas A. Klein
Thomas A. Klein, Clerk of Court
LG

BY: _____
Deputy Clerk

Electronically Issued Document ID: _____

(Plaintiff's Attorney or Plaintiff if they are not repre
Name: Attorney James Hursh, #6230
Attorney for: Plaintiff
Address: 120 W. State St. Suite 303
City: Rockford, Illinois 61101
Telephone: (815) 962-5490

Date of Service 20
(To be inserted by officer on copy left with the
employer or other persons)

If you have a disability that requires an accommodation to participate in Court, please contact the Court Disability Coordinator at (815) 319- 4806

****ELECTRONICALLY FILED****
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CASE NO: 2019-L-0000199
DATE: 6/12/2019 4:07 PM
BY: A H, DEPUTY

STATE OF ILLINOIS
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KINGDOM AUTHORITIES
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COMPLAINT

**COUNT I
BREACH OF CONTRACT**

NOW COMES the Plaintiff, KINGDOM AUTHORITIES INTERNATIONAL MINISTRIES, by and through his attorney, JAMES HURSH of DeRango and Cain, LLC, and in support of their complaint states as follows:

1. The Plaintiff, KINGDOM AUTHORITIES INTERNATIONAL MINISTRIES, is a religious organization duly organized pursuant to the laws of the State of Illinois.
2. Defendant, CHURCH MUTUAL INSURANCE COMPANY, is an Insurance Company with its principal place of business located at 11405 Community House Road, Charlotte, North Carolina 28277, and doing business in Illinois.
3. At all times pertinent hereto Plaintiff, KINGDOM AUTHORITIES INTERNATIONAL MINISTRIES, had a valid insurance contract with Defendant, CHURCH MUTUAL INSURANCE COMPANY, under policy number 0316490-02-025867, Plaintiff cannot at this time locate the full policy document, therefore it is not attached.
4. Said Insurance Policy provided for the Defendant, CHURCH MUTUAL INSURANCE COMPANY, to provide payment for repairs due to storm damage.
5. On or about May 15, 2017, Plaintiff's church and school were damaged by hail and high winds.
6. Several members of the church performed small repairs to mitigate any further damage to the Church property.

7. Plaintiff, KINGDOM AUTHORITIES INTERNATIONAL MINISTRIES, efforts to mitigate the damage were hampered by several incidents of rain and high winds on several occasions from May 2017 to December 2017.
8. Plaintiff, KINGDOM AUTHORITIES INTERNATIONAL MINISTRIES, made a claim for the damages on or about July 23, 2017.
9. Defendant, CHURCH MUTUAL INSURANCE COMPANY, has and continues to refuse to provide coverage for the claim.
10. Due to the Defendant, CHURCH MUTUAL INSURANCE COMPANY, denying coverage, Plaintiff, KINGDOM AUTHORITIES INTERNATIONAL MINISTRIES, has and continues to suffer from further damage as the roof continues to leak.
11. A representative of Neighborhood Adjusters determined the roof had been damaged by hail as noted in his inspection report.
12. The cost of repairs to the roof and ceiling and drywall is at least \$200,000.00
13. Plaintiff also operates a school out of the building which is affected by the continued rain and wind damage.

WHEREFORE, the Plaintiff, KINGDOM AUTHORITIES INTERNATIONAL MINISTRIES, respectfully prays the court:

1. Enter Judgment in favor of Plaintiff and against Defendant in an amount greater than \$200,000.00;
2. Order Defendant to pay Plaintiff's attorneys fees; and
3. Such other and further relief as the Court may deem just and proper.

**COUNT II
DECLARATORY ACTION**

NOW COMES the Plaintiff, KINGDOM AUTHORITIES INTERNATIONAL MINISTRIES, by and through his attorney, JAMES HURSH of DeRango and Cain, LLC., and in support of their complaint states as follows:

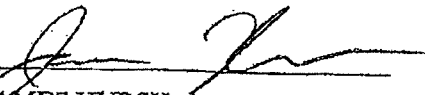
14. Plaintiff realleges paragraphs 1-13 above as if set forth herein Count II.
15. There is an actual controversy between the parties and by the provisions of 735 ILCS 5/2-701 this court is vested with the power to declare the rights of the parties.

WHEREFORE plaintiff, KINGDOM AUTHORITIES INTERNATIONAL
MINISTRIES, prays this honorable court:

1. Determine the rights of the parties;
2. Find the defendant has a duty to provide the financial coverage for repairs at the church,
3. For any other relief the court deems just and appropriate.

KINGDOM AUTHORITIES
INTERNATIONAL MINISTRIES, Plaintiff

BY:


JAMES HURSH, Attorney for Plaintiff

VERIFICATION

I, KINGDOM AUTHORITIES INTERNATIONAL MINISTRIES, being first duly sworn on oath deposes and state that I am the plaintiff herein, that I have read the foregoing complaint subscribed by me, and that the contents contained therein are true and correct to the best of my knowledge and belief.

*Melvin Brown

KINGDOM AUTHORITIES
INTERNATIONAL MINISTRIES, Plaintiff
By: Melvin Brown, Pastor

SUBSCRIBED AND SWORN to
before me this 31 day of
May, 2019

James Hursh
Notary Public



Signed pursuant to Supreme Court
Rule 137

James Hursh
James Hursh

Prepared By:
James Hursh, #6230997
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Served upon Church Mutual Ins. Co.
of 3006 Schuster Lane, Merrill, WI
54452 on 6/28/19 @ 10 AM
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